

## VMV Paducahbilt

1300 Kentucky Avenue Paducah, Kentucky 42003-1979

**EPPC - Division of Water KPDES** 

KPDES Permit # KY0003271

Dear Mr. Sartipi,

Per our 2008 agreement with the Permit Branch, NRE Acquisitions Co LLC (dba VMV Paducahbilt) respectfully submits twelve (12) months of sample data to be used as basis for formula corrections. In lieu of using the default assumption of 100 mg/L CaCO3 for Hardness, we submit that the 12 month average should be 231 mg/L. This data was collected at the outfall during monthly sampling for the DMR and is listed on the attached tables.

With that said, NRE request this hardness average correction be utilized to also correct the total lead average limit value. We submit that the corrected monthly total lead average limit should be approximately 9.2650 ug/L based on the actual hardness average of 231 mg/L.

It is our belief that since the permit went into effect with the total lead limit of 3.515 ug/L using the default 100 mg/L CaCO3 for hardness, that we have been in compliance with the intent of the permit using actual data as obtained over the past year. Therefore, any DMR total lead average limit exceedance that was noted above the 3.515 ug/L (default value) should be reconciled with the corrected limit based on actual data calculations (~9.2650 ug/L mo avg).

NRE Acquisition Co LLC (dba VMV Paducahbilt) respectfully requests the Permit Branch to open this permit for correction as described to recalculate the total recoverable lead monthly average limit using actual hardness data vs. any assumptions made. Furthermore, we are willing to add hardness to our monthly sampling plan for the DMR in order to build a long-term database for future permit calculations if the Division desires.

I look forward to hearing from you Mr. Sartipi, thank you!

Respectfully,

Director – QA. EHS

VMV Paducahbilt

Attachments: Table 1 and 2 Correction Calculations







	RECALCULATED AVG LEAD LIMIT BASED ON ACTUAL HARDNESS		DMR ACTUAL RESULTS
	HARDNESS	TOTAL LEAD	TOTAL LEAD
2008	CaCO3	Pb ug/L	DMR MO SAMPLE AVG (MAX)
APRIL	186	7.0103	2.100 2.100
MAY	260	10.7376	6.335 10.800
JUNE	329	14.4889	8.458 13.500
JULY	220	8.6806	4.513 4.230
AUG	195	7.4449	2.030 2.030
SEPT	203	7.8359	6.030 9.320
OCT	232	9.2878	1.590 1.590
NOV	220	8.6806	5.980 8.780
DEC	210	8.1814	8.170 10.300
2009			
JAN	271	11.3192	7.420 11.300
FEB	218	8.5802	9.210 15.600
MAR	225	8.9325	8.587 20.400

RUNNING

9.2650 EST AVG 231 5.8686 9.1625

DEFAULT ASSUMPTION

	THE RESERVE THE PERSON NAMED IN COLUMN 2 IS NOT THE PERSON NAMED I	
PERMIT USES	100	3.5150

DMR ANALYSIS	EFFLUENT DISCHARGE RESULT	MONTHLY AVG	QTR AVG	HARDNESS	CORRECTED AVG LIMIT
4/8/2008	2.10	MONTHLY AVG		ACTUAL HARDNESS	CORRECTED LEAD AVG LIN
FILEDOO		2.100	-11	186	7.0103
5/1/2008	5.56		41 1		
5/19/2008	7.44		-11 1	ACTUAL HARDNESS	CORRECTED LEAD AVG LI
5/20/2008	5.65		41 1	260	10.7376
5/21/2008	4.00		-11 1		
5/22/2008	3.31				
5/23/2008	3.82		QTR AVG		
5/29/2008 5/30/2008	10.80	MONTHLY AVG 6.335	5.631		
6/3/2008	The second secon	6.333	41 1		
6/9/2008	5.39		-11 1	ACTUAL HARDNESS	CORRECTED LEAD AVG LI
AND DESCRIPTION OF THE PERSON NAMED IN	4.93		-11 1	329	14.4889
6/13/2008	13.50		-11 1		
6/26/2008	12.90 5.57	MONTHLY AVG 8.458	41 1	1	
a/co/2000	5.51	6,436			
3/0/0000	1.00				
7/2/2008 7/21/2008	4.23		41 1	ACTUAL HARDNESS	CORRECTED LEAD AVG LII
the below the party of the last of the las	3.64		-11 1	220	8.6806
7/30/2008	5.67	MONTHLY AVG 4.513	41 1		
8/5/2008	0.00	4.313	-11 1		
0/0/2008	2.03	The second secon	-11 1	ACTUAL HARDNESS	CORRECTED LEAD AVG LI
			41 1	195	7.4449
		MONTHLY AVG 2.030			
9/9/2008	0.20	2.030	QTR AVG		
9/22/2008	9.32		4.191	ACTUAL HARDNESS	CORRECTED LEAD AVG LIN
9/23/2008	3.64 2.97		-11 1	203	7.8359
9/29/2008	5.21	The state of the s	-11 1		
9/30/2008	9.01		41 1	1	
3/30/2006	9.01	MANTH V MA	41 1	1	
		MONTHLY AVG 6.030	-11 1		
	ETIPE TO STANDARD BARBANCHER DE	0.000			
10/6/2008	1.59		La contract		
10/0/2000	1.00		-11 1	ACTUAL HARDNESS	CORRECTED LEAD AVG LIN
-		MONTHLY AVG	-11 1	232	9.2878
		1.590	-11		
11/1/2008	5.03		- 1	ACTUAL HARDNESS	COORTER LEAD MAN
	6.55		QTR AVG	ACTUAL HARDNESS	CORRECTED LEAD AVG LIN
	8.78	MONTHLY AVG	- UIR AVG	220	8.6806
	3.56	5.980	5.247		
12/1/2008	7.54		1 0.24	ACTUAL HARDNESS	CORRECTED LEAD AVOIL
	10.30		11 1	210	CORRECTED LEAD AVG LIN
	6.67	MONTHLY AVG	11 1	210	8.1814
		8.170	11 1		
1/5/2009	3.54			ACTUAL HARDNESS	CORRECTED LEAD AVG LIN
1/22/2009	11.30		11 1	271	11.3192
		MONTHLY AVG	11 1		11.3152
		7.420	11 1	l	
2/17/2009	4.90		11 I	ACTUAL HARDNESS	CORRECTED LEAD AVG LIN
2/23/2009	15.60		QTR AVG	218	8.5802
2/26/2009	7.13	MONTHLY AVG	11		0.0002
		9.210	8.406		
3/12/2009	20.40		11 1	ACTUAL HARDNESS	CORRECTED LEAD AVG LIM
3/24/2009	5.10		11	225	8.9325
3/27/2009	14.90		11 1		U.002J
3/28/2009	5.30		11 1		
3/30/2009	3.33	MONTHLY AVG	11		
3/31/2009	2.49	8.587	11 I		
			E CONTRACTOR DE LA CONTRACTOR DE		
gretorio se ga					
arenerous estati		OVERALL RUNNING MO AVG		HARDNESS AVG	CORRECTED LIMIT AVG